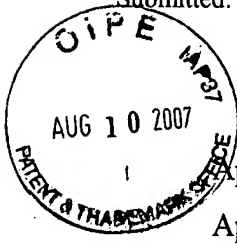


8-13-07
Amended Appeal Brief
Appl. No.: 10/076,362
Submitted: August 10, 2007

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DFW



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appl. No.: 10/076,362 Confirmation No.: 1508
Applicant: Druyan et al.
Filed: February 14, 2002
TC/A.U. 3623
Examiner: Kalyan K. Deshpande
Docket No.: AUS920011019US1
Customer No.: 46129
Title: METHOD AND SYSTEM FOR MANAGING SERVICE REQUESTS
ACROSS MULTIPLE SYSTEMS

Honorable Commissioner
P. O. Box 1450
Alexandria, Virginia 22313-1450

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**AMENDMENT TO APPEALLANT'S BRIEF
IN RESPONSE TO NOTIFICATION OF NON-COMPLIANT APPEAL BRIEF
(37 C.F.R. § 41.37)**

This amendment is to a previously filed Appeal Brief, which was filed May 28, 2007, which appealed from the decision of the examiner dated October 27, 2007, rejecting claims 1-11, 13-23 and 25-28. This amendment is in response to a Notification of Non-Compliant Appeal Brief mailed on July 10, 2007.

1. REAL PARTY IN INTEREST

The real party in interest in this appeal is International Business Machines Corporation (IBM).

2. RELATED APPEALS AND INTERFERENCES

With respect to other appeals or interferences that will directly affect, or be directly affected by, or have a bearing on the Board's decision in the pending appeal, there are no such appeals or interferences.

3. STATUS OF CLAIMS

Claims 1-11, 13-23 and 25-18 are pending in this application; claims 1-11, 13-23 and 25-18 have been finally rejected; claims 1-11, 13-23 and 25-18 have been appealed. No claims have been allowed.

4. STATUS OF AMENDMENTS

No current amendments are pending.

5. SUMMARY OF THE CLAIMS

Claim 1 covers a method for displaying a list of service requests from multiple service request systems on a single display. The initial step (Figure 4, step 60 and [0033]) in the method is to receive a service inquiry at a service manager location. Once this service is received, the next step (Figure 4, step 61 and [0033]) is to formulate and send a service request status message to a plurality of service ticketing systems from the service manager. All responses to the service request status messages from service ticketing systems are received and merged into a single list of responses (Figure 4, step 63 and [0033]). The tickets in the response list are sorted by predetermined parameters and sorted ticket request list is generated Figure 4, step 65 and [0033]. Figure 4, step 7 and [0033] displays the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 11 describes a method for displaying a list of service requests from multiple service request systems on a single display. In this method, there is an initial step (Figure 3 decision block "ticket exist") that determines whether a list of tickets currently exist for an inquiring service technician. A sorting technique (Figure 3, step 65, Figure 5) sorts the tickets in the response list by pre-determined parameters. This step also generates a sorted ticket request list, by creating an integer array (Figure 5); comparing tickets in a one-to-one format using a pre-determined parameters (Figure 5); directing the next free pointer in the array to the next ticket in the order as a result of the comparison (Figure 5); and storing this list in the cache memory. The final step in this method is to display (step 67) the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 14 is a computer program product that implements the method described in claim 11. This program product contains instructions for displaying a list of service requests from multiple service request systems on a single display. The initial instructions (Figure 4, block 60 and [0033]) in the program product are to receive a service inquiry at a service manager location. Once this service is received, the next instructions (Figure 4, block 61 and [0033]) are to formulate and send a service request status message to a plurality of service ticketing systems from the service manager. Next are instructions such that all responses to the service request status messages from service ticketing systems are received and merged into a single list of responses (Figure 4, block 63 and [0033]). The tickets in the response list are sorted by predetermined parameters and sorted ticket request list is generated Figure 4, block 65 and [0033]. Figure 4, block 7 and [0033] provide instructions for displaying the sorted ticket request lists containing ticket request from multiple ticket request systems.

Claim 23 describes a program product that implements the method described in claim 14. This program product contains instructions for displaying a list of service requests from multiple service request systems on a single display. In this product, there are initial instructions (Figure 3 decision block "ticket exist") that determine whether a list of tickets currently exist for an inquiring service technician. Sorting instructions enact techniques (Figure 3, block 65, Figure 5) that sort the tickets in the response list by pre-determined parameters. These instructions also generate a sorted ticket request list, by creating an integer array (Figure 5); comparing tickets in a one-to-one format using a pre-determine parameters (Figure 5); directing the next free pointer in the array to the next ticket in the order as a result of the comparison (Figure 5); and storing this list in the cache memory. The final instructions in this program product display (block 67) the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 25 describes a system for displaying a list of service requests from multiple service request systems on a single display. This system has a local computer (Figure 1, item 10 and paragraph [0025]) and for displaying service ticket lists. In the system is a ticket manager (Figure 3, item 49 and paragraph [0032]) that has the capability to retrieve, merge and sort service tickets from multiple ticketing systems (Figure 3, items 41, 42, 43 and 44). Ticket manager adapters (Figure 3, items 45, 46, 47 and 48 and paragraphs [0032] and [0033]) convert information between said ticket manager and ticketing systems, in order to provide a uniform format to display (Figure 1) ticketing request generated at different ticketing systems.

6. GROUNDS OF REJECTIONS TO BE REVIEWED ON APPEAL

6.A. – Was 35 U.S.C. § 103(a) properly applied in a rejection of claims 1-11,13-23 and 25-28 as being unpatentable over Northcutt et al. (US Patent Publication No. 20030126001).

7. ARGUMENTS IN SUPPORT OF SEPARATE PATENTABILITY

7A.

Background of the present invention

Applicants' present invention provides an efficient method and system to manage service requests across multiple service request systems. This management method involves merging all service requests from multiple systems into standard system, sorting the request according to some standard and presenting a display list of all of the requests having a common characteristic to a technician or requester. Service requests are gathered from many different backend-ticketing systems and presented to the technicians in a single logical view. Service requests gathered from each backend ticketing system are packaged in an XML document format. The efficient use of a common XML format is an efficient way to manage all service requests from all backend-ticketing systems. These service requests can be sorted by ticket open or close date/time, status, severity of problem, etc. in ascending or descending order and be presented to the technicians in a single logical view. These service requests from different backend systems are presented to a viewer in a display as a single logical view.

Background of Northcutt

A system and method for managing the workflow of request for services from a department within an organization, the requests for service being provided by other members of the organization. A request for service input module enables one or more requesting members of the organization to input information for a request for service from the department by connecting to the system over a network (e.g., an intranet). A database system stores information regarding the requests for service received by the request for service input module. A change of status input module enables a service provider participant from the department to update the status of a request by connecting

to the system over a network. A signoff module enables a service provider participant and a requesting member to signoff a requested service, the participant and requesting member connecting to the system over a network.

Distinction between Inventions

Applicants do admit that both inventions can enable one to generate and display a report containing a plurality of service requests. However, there are several distinctions between the present invention and Northcutt. These distinctions can be best illustrated through the figures in each invention. Referring to Figure 3, Applicants' present invention receives a status request at a central location 50 from a browser interface location 51. This browser 51 is the interface of a user and is on what can be called the front end of the system. The central location (gateway manager) then retrieves information that is stored in remote or distributed locations in backend ticketing systems (41, 42, 43 and 44). In this system, there is backend-ticketing system 40. This system contains multiple ticketing systems 41, 42, 43, and 44 that receive service request. As mentioned, these systems can have various formats such as a single connections database format or a Java database format. For instance, system a 41 can be a Help Desk system has a specific method for accessing that system. System 42 can be CRM system that has a java format used to access that system. Each backend ticketing system connects to a gateway adapter 45, 46, 47, and 48. These gateway adapters are designed such that they can communicate with a particular backend ticketing system and with the gateway manager 49. The ticketing systems 41-44 are different from the browser interface location 51.

Applicants believe that the Examiner is confusing the browser interface 51 and the ticketing systems 41-44. Examiner stated in the last response that "although Northcutt failed to explicitly teach sending service requests status to a plurality of service ticketing systems, this limitation is obvious in light of Northcutt. A plurality of service ticketing systems is defined as a plurality of interfaces to retrieve ticket request information. Northcutt teach a plurality of interfaces that can be used to retrieve, view modify or edit service requests." This description goes with functions performed by the user. This interface is the browser 51, not the ticketing systems 41-44. These ticketing

systems are on the backend and not accessed by the user. Their interface is with the gateway manager. These ticketing systems store service request information in a manner that is similar to the central workflow management system 10 of Northcutt.

As Applicants have previously stated, a major distinction between the inventions is the configuration of the systems. In the present invention, the service request information for each system is stored remotely in that system and then retrieved as requested by the gateway manager 50. In Northcutt, the service request information is kept in a central database and workflow management system 10. Because of the different system configurations, the methods and technique to retrieve service request information is also different.

In Northcutt, certain information (14, 16 and 18) flows through the central manager. This information is apparently stored in the central management system 10 and associated repositories 12. In Northcutt, the information is already in a central place and there is no need to query remote locations to retrieve the requested information in response to a service request inquiry. This information is already in the central manager and associated repositories. In Applicants' present invention, because the information for different systems is stored in distributed locations, the gateway manager has to first query the distributed locations for information.

Response to the Examiner's Rejection

With reference to claim 1, 11, 14 and 23, the step of the step of formulating and sending a service request status message to a plurality of persons from the service manager, these steps are different in the two inventions. Examiner is confusing sending status request to a plurality of service managers in Northcutt and in the present invention. In Applicants' present invention, these status requests are going to the ticketing systems 41-44. In Northcutt, the status request status message is going to the end users. In the Applicants' present invention, the message is a 'service request status message'. Applicants admit that a more accurate description is a 'service request status inquiry message'. In the present invention, this step is making a request. This message is a query to get information. In Northcutt, the message is a response to a previously received inquiry from a user. In Northcutt, the 'service request' is the name of what the inquiry is

about. This is the reason, the messages are going to different locations in the different systems.

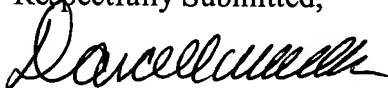
In order to establish a prima facie case of obviousness, there has to be a suggestion or teaching to modify (combine) the references. If there is no teaching, there is no prima facie case for obviousness. In the present invention, there is no teaching or suggestion in Northcutt to suggest the implementation of the Applicants' present invention in which service request information is stored in distributed and remote locations from a center gateway manager. Northcutt is opposite as it describes access by user to a service request information stored in a central location. Applicants' present invention describes access through a browser and central gateway to information stored in distributed locations. Because the configurations of Applicants' invention and Northcutt appear to be opposite, Applicants submit that it is not obvious to produce Applicants' present invention in view of Northcutt,

8. CONCLUSION

Applicants submit that all of the pending claims are in condition for allowance. Applicants further submit that the amendments as discussed with the Examiner were for the purpose of further defining the impersonator programs of the present invention. Applicants believe that no additional search should be required in view of the type of amendments Applicants made to the claims. Therefore, withdrawal of the rejections and passage to issuance is respectfully requested.

In view of the above arguments, it is respectfully urged that the rejection of the claims should not be sustained.

Respectfully Submitted,



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APPENDIX I CLAIMS

Claim 1 (Original) A method for displaying a list of service requests from multiple service request systems on a single display comprising the steps of:

- receiving a service inquiry at a service manager location;
- formulating and sending a service request status message to a plurality of service ticketing systems from the service manager;
- receiving and merging responses to the service request status message from service ticketing systems into a single list of responses;
- sorting the tickets in the response list by predetermined parameters and generating a sorted ticket request list; and
- displaying the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 2 (Original) The method as described in claim 1 further comprising the step of converting the service status request message to a format for each particular ticketing system.

Claim 3 (Original) The method as described in claim 1 further comprising the step of converting the responses from the plurality of ticketing systems into a common format for receipt and processing by the service manager.

Claim 4 (Original) The method as described in claim 1 wherein said sorted list is stored in cache memory.

Claim 5 (Original) The method as described in claim 1 wherein said sorting step further comprises creating multiple sorted lists and storing these list in the cache.

Claim 6 (Previously presented) The method as described in claim 1 wherein said sorting step further comprises the steps of:

- creating an integer array;
- comparing tickets in a response list in a one-to-one format using a pre-determine parameters;
- directing the next free pointer in the array to a next ticket in the response list in an order that results from the comparison; and
- storing a sorted response list in the cache memory.

Claim 7 (Original) The method as described in claim 1 wherein said sorting step further comprises: determining whether a sort map exist for a service ticket list; and displaying sorted tickets based on a sort from a preexisting sort map.

Claim 8 (Original) The method as described in claim 1 wherein said sorting step further comprises: determining whether a sort map exist for a service ticket list; and creating a sort map when there is a determination that no sort map exist.

Claim 9 (Original) The method as described in claim 1 further comprising the step of: determining the elapsed time since the last inquiry by a particular service technician; and resetting the ticket lists in the cache, if a predetermined time period has expired.

Claim 10 (Original) The method as described in claim 9 wherein said resetting step comprises retrieving additional tickets for the ticketing systems.

Claim 11 (Previously presented) A method for displaying a list of service requests from multiple service request systems on a single display comprising the steps of:

- determining whether a list of tickets currently exist for an inquiring service technician;

- sorting the tickets in the response list by pre-determined parameters and generating a sorted ticket request list, by creating an integer array; comparing tickets in a one-to-one format using a pre-determine parameters; directing the next free pointer in the array to the next ticket in the order as a result of the comparison; and storing this list in the cache memory; and

- displaying the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 12 (Canceled)

Claim 13 (Original) The method as described in claim 11 wherein said sorting step further comprises the step of creating a sort map to perform a comparison of tickets during a sort.

Claim 14 (Original) A computer program product in a computer readable medium for displaying a list of service requests from multiple service request systems on a single display comprising:

- instructions for receiving a service inquiry at a service manager location;

- instructions for formulating and sending a service request status message to a plurality of service ticketing systems from the service manager;

- instructions for receiving and merging responses to the service request status message from service ticketing systems into a single list of responses;

- instructions for sorting the tickets in the response list by pre-determined parameters and generating a sorted ticket request list; and

- instructions for displaying the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 15 (Original) The computer program product as described in claim 14 further comprising instructions for converting the service status request message to a format for each particular ticketing system.

Claim 16 (Previously presented) The computer program product as described in claim 14 further comprising the instructions for converting the responses from the plurality of ticketing systems into a common format for receipt and processing by the service manager.

Claim 17 (Previously presented). The computer program product as described in claim 14 wherein said sorting instructions further comprise instructions for creating multiple sorted lists and storing these list in the cache.

Claim 18 (Previously presented) The computer program product as described in claim 14 wherein said sorting instructions further comprise: instructions for creating an integer array; instructions for comparing tickets in a response list in a one-to-one format using a pre-determine parameters; instructions for directing a next free pointer in the array to the next ticket in the response list in an order as that results from the comparison; and instructions for storing a sorted response list in the cache memory.

Claim 19 (Previously presented) The computer program product as described in claim 14 wherein said sorting instructions further comprise: instructions for determining whether a sort map exist for a service ticket list; and instructions for displaying sorted tickets based on a sort from a preexisting sort map.

Claim 20 (Previously presented) The computer program product as described in claim 14 wherein said sorting instructions further comprise: instructions for determining whether a sort map exist for a service ticket list; and instructions for creating a sort map when there is a determination that no sort map exist.

Claim 21 (Previously presented) The computer program product as described in claim 14 further comprising the instructions for: determining the elapsed time since the last inquiry by a particular service technician; and resetting the ticket lists in the cache, if a predetermined time period has expired.

Claim 22 (Original) The computer program product as described in claim 21 wherein said resetting instructions further comprise instructions for retrieving additional tickets for the ticketing systems.

Claim 23 (Previously presented) A computer program product in a computer readable medium for displaying a list of service requests from multiple service request systems on a single display comprising:

- instructions for determining whether a list of tickets currently exist for an inquiring service technician;

- instructions for sorting the tickets in the response list by pre-determined parameters and generating a sorted ticket request list, instructions for creating an integer array; instructions for comparing tickets in a one-to-one format using a pre-determine parameters; instructions for directing the next free pointer in the array to the next ticket in the order as a result of the comparison; and storing this list in the cache memory; and

- instructions for displaying the sorted ticket request list containing ticket request from multiple ticket request systems.

Claim 24 (Canceled)

Claim 25 (Previously presented) A system for displaying a list of service requests from multiple service request systems on a single display comprising:

- a local computer for displaying service ticket lists;
- a ticket manager having the capability to retrieve, merge and sort service tickets from multiple ticketing systems;

- ticket manager adapters for converting information between said ticket manager and ticketing systems, in order to provide a uniform format to display ticketing request generated at different ticketing systems.

Claim 26 (Original) The system as described in claim 25 further comprising a browser program to provide the capability to view and scan displayed service tickets and to interface with the ticket manager.

Claim 27 (Original) The system as described in claim 25 further comprising a cache memory to contain sorted listed from the merged service tickets.

Claim 28 (Original) The system as described in claim 26 further comprising conversion programs in said ticket manager adapters.

EVIDENCE APPENDIX

In accordance with 37 CFR 41.37, submitted herein evidence entered by the examiner and relied upon by appellant in the appeal. No evidence was relied upon.

RELATED PROCEEDINGS APPENDIX

There are no related proceedings for this appeal.